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Attorneys for Plaintiff Pacific Information Resources, Inc.

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

Pacific Information Resources, Inc., a  
 California Corporation,

Plaintiff,

vs.

SIMPLE COMMUNICATIONS, an Alabama  
 corporation; WILLIAM TRAVIS SULLIVAN,  
 individually, AND DOES 1 through 100,  
 inclusive, WHOSE IDENTITIES ARE  
 UNKNOWN,

Defendants.

**CASE NO. CV-07-4131 MMC**

**[Before the Honorable Maxine M.  
 Chesney, Courtroom 7]**

**PLAINTIFF'S REQUEST TO  
 CONTINUE DATE FOR FILING  
 MOTION FOR DEFAULT JUDGMENT  
 AGAINST WILLIAM TRAVIS  
 SULLIVAN AND SIMPLE  
 COMMUNICATIONS**

Complaint Filed: August 9, 2007  
 Discovery Cut-Off: N/A  
 Trial: N/A  
 Status Conference: February 8, 2008

**TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR  
 ATTORNEYS OF RECORD HEREIN:**

Plaintiff Pacific Information Resources, Inc. ("Plaintiff") hereby requests a continuance  
 of the Court to file its Default Judgment Application on Wednesday, February 27, 2008, instead  
 of on February 22, 2008. Plaintiff makes this request on the basis of good cause:

1. Extrapolating the voluminous data necessary to support the Default Judgement  
 has *exceeded all expectations. The initial report, finally received, indicates*

1  
**Request to Continue Date for Filing Motion for Default Judgment**

**Case No. CV-07-4131**

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*damages in excess of \$15 million! Counsel for Plaintiff wants to be certain that the analysis is solid and will sustain any review by the court.*and

4. One of Plaintiff's experts, Professor Ran Hadas, is teaching and researching at the University of Sydney in Australia until July, 2008. Thus, coordinating with Professor Hadas has been an extremely time consuming and logistical challenge.

Plaintiff's counsel humbly apologizes to the Court and begs the Court's indulgence this one last time. Plaintiff's counsel has three motions for Summary Judgment to file with this honorable court on March 21 in a related case. Thus, Plaintiff's counsel is thus quite desirous and confident of completing this default application on February 27.

There will be no prejudice to any party who has direct or related interest in this case, including those parties who are Defendants in the related case noted herein.

Respectfully submitted,

DATED: February 22, 2008

**NOVO LAW GROUP, P.C.**

BY: /s/Konrad L. Trope, Esq.  
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Attorneys for Plaintiff PACIFIC  
INFORMATION RESOURCES,  
INC.

**[PROPOSED] ORDER**

Plaintiff Pacific Information Resources has hereby requested continuance to file its Defaults Judgment Application against Defendants William Travis Sullivan and Simple Communications to February 27, 2008.

1 Having considered the requested extension, good cause appearing, therefore, and no  
2 prejudice any parties appearing, IT IS HEREBY ORDERED that:

3 Plaintiff shall file its Application for Default Judgment not later than February 27, 2008.

4 Dated: \_\_\_\_\_

Honorable MAXINE M. CHESNEY  
United States District Judge

**PROOF OF SERVICE**

I am employed in the County of Orange, State of California in the office of a member of the Bar of this Court at whose direction this service was made. I am over the age of 18 and not a party to the within action; my business address is: **4631 Teller Avenue, Suite 140, Newport Beach, California 92660.**

On **February 22, 2008**, I served the foregoing document described as:

**REQUEST TO CONTINUE DATE FOR FILING MOTION FOR  
DEFAULT JUDGMENT AGAINST WILLIAM TRAVIS SULLIVAN AND  
SIMPLE COMMUNICATIONS**

on the interested parties in this action by placing ☐ the original ☒ a true copy thereof enclosed in a sealed envelope addressed as follows:

***SEE ATTACHED SERVICE LIST***

**XX BY MAIL:** I deposited such envelope in the mail at Newport Beach, California. The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with the United States Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

**BY INTERNET/E-MAIL:** I transmitted the foregoing document by e-mail to the party(s) identified above by using the Internet Protocol Addresses indicated. Said transmission(s) were verified as complete and without error.

**BY INTERNET/E-MAIL WITH CLERK OF THE COURT:** I certify that on 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing as indicated on the attached Mailing List.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **February 22, 2008**, at Newport Beach, California.

/s/  
Konrad L. Trope

***SERVICE LIST:***

*Pacific Information Resources v Simple Communications, et. al.*  
Case No. C-07-4131 MMC

**VIA U.S. MAIL**

William Travis Sullivan  
4931 Mason Road  
Clayton, Washington 99110

Simple Communications  
4931 Mason Road  
Clayton, Washington 99110

Simple Communications  
701 22nd Avenue  
Tuscaloosa, Alabama 35401